

Ethical Trading Policy

WSR Medical Solutions Limited is dedicated to upholding the highest ethical standards in all aspects of our operations and supply chains. Guided by the principles of the Ethical Trading Initiative (ETI), we commit to fair, safe, and sustainable practices that respect human rights and foster positive impacts in the communities we serve.

Our Commitments

1. Respect for Human Rights

We are committed to ensuring the dignity, rights, and welfare of all individuals involved in our operations. This includes workers in our supply chain, who are entitled to fair treatment and the freedom to exercise their rights.

2. Employment is Freely Chosen

We oppose all forms of forced or bonded labor. Employment relationships at WSR Medical Solutions Limited and within our supply chain are based on mutual consent, with employees free to leave their jobs after reasonable notice without penalty.

3. Fair Wages and Compensation

We ensure that all workers are paid wages that meet or exceed national legal standards or industry benchmarks, whichever is higher. Wages must meet basic needs and provide discretionary income.

4. Safe and Hygienic Working Conditions

We provide a working environment that meets international health and safety standards. Regular training, risk assessments, and protective measures are implemented to minimize hazards and safeguard employee well-being.

5. Freedom of Association

Workers are free to join or form trade unions of their choosing and to collectively bargain. We respect and uphold these rights throughout our operations and supply chain.

6. No Child Labour

We strictly prohibit child labour in any form. We comply with international standards and national laws to ensure that no person below the legal minimum working age is employed in any part of our operations or supply chain.

7. Working Hours

We adhere to laws governing working hours and overtime. All overtime work is voluntary and compensated at a premium rate as mandated by national laws or collective agreements.

8. No Discrimination

Discrimination on the basis of age, gender, race, religion, disability, marital status, sexual orientation, or political affiliation is prohibited in our recruitment, promotion, compensation, and other employment practices.

9. Regular Employment

Employment is provided based on recognized legal agreements. We do not use labor-only contracting or similar practices that undermine the rights of workers.

10. Ethical Conduct

Harassment, abuse, or any form of intimidation is strictly prohibited. WSR Medical Solutions Limited is committed to fostering a workplace culture of respect and dignity.



Paul Dixon

Managing Director

Modern slavery is a global issue which can affect any business in any sector and which is often very difficult to detect. It is extremely difficult if not impossible for any international organisation to guarantee that its business and supply chain is slavery free but Rothband Limited recognises and takes very seriously the risk of modern slavery to our business and our people and we are committed to taking steps to reduce the risk of this abhorrent crime occurring within our business and supply chain.

Rothband Limited Structure

We are a manufacturer and supplier of X-Ray Protection and radiology accessories.

Our UK Supply Chain

As a provider of UK manufactured goods with UK sourced materials we consider our supply chain to be relatively simple in comparison to many other industries.

In the UK we work with a small range of suppliers who provide goods and services across a number of different categories: Materials, IT and telecoms, marketing, legal and other services. Therefore, we have close relationships with our suppliers and good visibility of our supply chain.

Having performed a risk assessment of our UK supply chain we consider that there is a relatively low risk of labour exploitation or other forms of slavery and human trafficking occurring within it. Nevertheless, we are committed to preventing these practices from occurring within both our business and our supply chain, which is demonstrated by our policies and due diligence procedures as outlined below.

Our Policy on Modern Slavery and Human Trafficking

Our UK suppliers are required to comply with our Employee Code of Conduct (which also applies to all Rothband Limited employees.)

These policies reflect our commitment to acting ethically and with integrity in our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our business and UK supply chain.

Due Diligence Processes for Slavery and Human Trafficking

Our Own Business

Rothband Limited prohibits the use of all forms of forced labour and any form of human trafficking.

As part of our own business we employ a local work force and we ensure:

- They have a right to work in the UK. This involves asking the individual direct to view their passport. A delay in providing the passport might indicate a modern slavery issue;
- We check that personnel have a bank account in their own name into which their remuneration is paid; and

In addition, our employees, through the Employee Code of Conduct, are made aware of Rothband Limited's requirement for employees to support and uphold human rights principles and know that Rothband Limited will not tolerate, engage in or support the use of, forced labour.

Our Supply Chain

As part of our initiative to identify, monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we have undertaken the following due diligence procedures:-

(a) we have completed the mapping of our tier 1 suppliers who provide goods and services direct to our UK business;

(b) we wrote to all our UK supplier to note our commitment to transparency and combatting modern slavery within our own organisation and our similar expectation from suppliers of goods and services to us, sending each supplier the Rothband Limited Supplier Code of Conduct and requesting a signed confirmation from those suppliers that they adhere to our required standards;

(c) in addition, each UK supplier has been sent a questionnaire so we can further assess their approach to the issue of modern slavery;

(d) we have reserved the right with our all UK suppliers to request access to their facilities for members of our Internal Audit Team to check compliance with the Rothband Limited Supplier Code of Conduct. Such on-site audits would also help us to identify whether a supplier was engaged in unethical practices, which might include forced labour or other forms of modern slavery;

(e) we have updated our terms and conditions with our key UK suppliers to include anti-modern slavery clauses which place an obligation on suppliers to comply with the Modern Slavery Act 2015; and

If we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015 then we would require the relevant supplier to remedy such non-compliance and we would consider terminating our relationship should we see no improvement in the way their business is conducted.

This approach is designed to:

- identify and assess potential risk areas in our UK supply chain;
- mitigate the risk of slavery and human trafficking occurring in the supply chain;

- monitor potential risk areas in the supply chain; and
- provide adequate protection to whistle blowers.

Training and Performance Indicators

Given our view that Rothband Limited's exposure to modern slavery risk is limited, and the existing due diligence processes we already have in place as an organisation, except as noted above, we have not implemented any specific training of our UK employees or key performance indicators in relation to modern slavery and human trafficking.

Further Steps

Following a review of the effectiveness of the steps taken to prevent modern slavery or human trafficking occurring in our business and UK supply chain, we intend to take the following further steps to combat slavery and human trafficking during the course of the 2018 financial year:

- continue to monitor the risk to our UK supply chain on an ongoing basis;
- consider further how best to map the supply chains of our overseas businesses.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2017.



Paul Dixon
Managing Director
Rothband Limited